

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS,

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS-HARVARD
FACULTY CHAPTER,

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS AT NEW
YORK UNIVERSITY,

RUTGERS AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS-AMERICAN
FEDERATION OF TEACHERS, and

MIDDLE EAST STUDIES ASSOCIATION,

Plaintiffs,

v.

MARCO RUBIO, in his official capacity as
Secretary of State, and the DEPARTMENT
OF STATE,

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, and the
DEPARTMENT OF HOMELAND
SECURITY,

TODD LYONS, in his official capacity as
Acting Director of U.S. Immigration and
Customs Enforcement,

DONALD J. TRUMP, in his official capacity
as President of the United States, and

UNITED STATES OF AMERICA,

Defendants.

Civil Action No. 1:25-cv-10685-WGY

MOTION FOR ADMISSION PRO HAC VICE OF NOAM BIALE

Pursuant to Local Rule 83.5.3, Edwina Clarke, an attorney admitted to practice before this Court, hereby moves for the admission of Noam Biale of Sher Tremonte to appear and practice before this Court representing Plaintiffs in the above-captioned matter. The applicant meets the requirements of the Local Rule as demonstrated in his declaration, attached hereto.

Dated: May 5, 2025

Respectfully submitted,

/s/ Edwina Clarke

Edwina Clarke, BBO 699702
Zimmer, Citron & Clarke, LLP
130 Bishop Allen Drive
Cambridge, MA 02139
(617) 676-9423
edwina@zimmercitronclarke.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I, the undersigned counsel, certify that on May 5, 2025, I electronically filed the foregoing motion in the United States District Court for the District of Massachusetts using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Dated: May 5, 2025

/s/ Edwina Clarke

Edwina Clarke, BBO 699702